

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

DANIEL COURNEY

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Hon. Edward S. Kiel

Mag. No. 21-mj-15452 (ESK)

CRIMINAL COMPLAINT

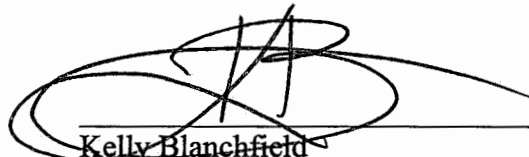
I, Kelly Blanchfield, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and that this complaint is based on the following facts:

SEE ATTACHMENT B

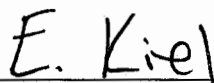
continued on the attached pages and made a part hereof.



Kelly Blanchfield
Special Agent
Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence
on the 2nd day of November, 2021
at Newark, New Jersey

HONORABLE EDWARD S. KIEL
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count 1

**Freedom of Access to Reproductive Health Services
18 U.S.C. § 248(a)(1)**

On or about October 16, 2021, in Bergen County, in the District of New Jersey, and elsewhere, defendant

DANIEL COURNEY

knowingly used force and physical obstruction to intentionally intimidate and interfere with Victim-1 because Victim-1 was or had been providing reproductive health services.

In violation of Title 18, United States Code, Section 248.

Count 2

**Freedom of Access to Reproductive Health Services
18 U.S.C. § 248(a)(1)**

On or about October 30, 2021, in Bergen County, in the District of New Jersey, and elsewhere, defendant

DANIEL COURNEY

knowingly used force and physical obstruction to intentionally intimidate and interfere with Victim-1 because Victim-1 was or had been providing reproductive health services.

In violation of Title 18, United States Code, Section 248.

ATTACHMENT B

I, Kelly Blanchfield, am a Special Agent with the Federal Bureau of Investigation. I am aware of the facts contained herein based upon interviews and briefings with other law enforcement officers. I also have reviewed or been briefed regarding other evidence, including witness interviews and video recordings. Because this complaint is being submitted for the limited purpose of establishing probable cause, I have not set forth herein each and every fact that I know or that has been told to me concerning this investigation. Unless specifically indicated, any statements herein attributed to individuals are set forth in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. All referenced times are approximate and refer to Eastern Time.

1. At times relevant to this complaint:

- a. The Clinic is a health care facility as defined in 18 U.S.C. § 248(e)(1), that provides reproductive health services as defined in 18 U.S.C. § 248(e)(5). The Clinic is located in a two-story building in Englewood, New Jersey. The Clinic has a street-level front entrance, directly adjacent to a public sidewalk. Patients and their companions generally park on the street, or in nearby parking lots, and walk down the public sidewalk to the Clinic. The Clinic also has a small parking lot, which is used by staff only and is accessed by an alley to the side of the Clinic building.
- b. Victim-1 is a volunteer at the Clinic. As a volunteer, he advises patients and their companions as to parking and escorts them into and out of the Clinic so the patients may receive reproductive health care services.

2. At approximately 10:00 a.m. on October 16, 2021, a woman who was seeking reproductive health services at the Clinic ("Patient-1") was driven to the Clinic by another individual ("Companion-1") in a vehicle ("Vehicle-1"). Companion-1 pulled over at the curb in front of the Clinic and asked Victim-1 where to park.

3. As Victim-1 was directing Companion-1 and Patient-1 to nearby parking, Defendant, DANIEL COURNEY, approached Vehicle-1 and told Patient-1 to "save your child," and not to go into the Clinic. Defendant COURNEY also told Patient-1 and Companion-1 not to listen to Victim-1's directions. Defendant COURNEY then shoved Victim-1 away from the window of Vehicle-1 in order to prevent Victim-1 from directing Companion-1 and Patient-1 to parking so they could enter the Clinic.

4. At approximately 9:47 a.m. on October 30, 2021, Victim-1 was escorting another woman seeking reproductive health services ("Patient-2") to the entrance of the Clinic. As Victim-1 and Patient-2 approached the Clinic's front door, Defendant COURNEY approached them and moved his body between Victim-1 and Patient-2. Defendant COURNEY then shoved Victim-1 toward the street. Patient-2 then continued walking and entered the Clinic. Outside, Defendant COURNEY taunted Victim-1 calling him a "coward."